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**U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION**

**ORDER  
FS 8000.RCCB**

Effective Date:

xx/xx/xx

**SUBJ: Regulatory Consistency Communication Board (RCCB)**

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This Federal Aviation Administration (FAA) Aviation Safety (AVS) order establishes the Regulatory Consistency Communication Board (RCCB) within the Aircraft Certification Service (AIR) and Flight Standards Service (AFS) and defines how the RCCB operates.

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Associate Administrator for Aviation Safety

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## CHAPTER 1. GENERAL INFORMATION

- 1.1 Purpose of This Order.** This order establishes the Regulatory Consistency Communication Board (RCCB) within the Flight Standards Service (AFS) and the Aircraft Certification Service (AIR). This order contains guidance that is administrative in nature.
- 1.2 Audience.** All AFS and AIR employees.
- 1.3 Where You Can Find This Order.** You can find this order on the MyFAA employee Web site at [https://employees.faa.gov/tools\\_resources/orders\\_notices](https://employees.faa.gov/tools_resources/orders_notices), or through the Flight Standards Information Management System (FSIMS) at <http://fsims.avs.faa.gov>. Individuals outside the FAA can find this order on the FAA’s Web site at <http://fsims.faa.gov>, <http://rgl.faa.gov>, or [http://www.faa.gov/regulations\\_policies/orders\\_notices](http://www.faa.gov/regulations_policies/orders_notices).
- 1.4 Effective Date and Duration.** The RCCB is effective upon signature of this order. It will remain in effect until canceled by the Associate Administrator for Aviation Safety (AVS-1).
- 1.5 Background.** On February 14, 2012, the President signed the FAA Modernization and Reform Act of 2012 (the Act), Public Law 112-95. Pursuant to section 313 of the Act, the FAA chartered the Consistency of Regulatory Interpretation Aviation Rulemaking Committee (ARC). The ARC created a forum for the U.S. aviation community to assess, determine the root causes of, and provide recommendations to reduce inconsistent interpretation and application of regulations. One of the ARC’s recommendations was that the FAA should establish an RCCB comprised of representatives from AFS, AIR, and the Office of the Chief Counsel (AGC) to provide clarification to internal and external stakeholders on questions related to the application of regulations.

**CHAPTER 2. PURPOSE AND RESPONSIBILITIES**

- 2.1 Purpose.** The RCCB's purpose is to provide a collaborative environment where AFS, AIR, and AGC representatives discuss, clarify, and provide resolutions to complex issues involving inconsistencies brought forward by internal and external stakeholders. The intent of the RCCB is to promote an agile organization and resolve issues with durable decisions. RCCB activities will directly support the principles of consistency, interdependence, and critical thinking expected to be employed by the AVS workforce.
- 2.2 Appropriate Issues.** Issues brought to the RCCB should involve regulations and policies overseen by AFS or AIR. The RCCB will focus on addressing inconsistencies within or between these services that require input from more than one policy division, directorate, service, or line of business. Examples of issues that may be worked through the RCCB are inconsistencies between regulations, guidance, and related documents, or inconsistencies in the application of regulations or policies.
- 2.2.1** The RCCB will review all issues submitted. However, issues of inconsistency that do not require input from multiple policy offices will not be addressed through the full RCCB process. For example, if a question brought to the RCCB can be answered by a single policy division (e.g., the Aircraft Maintenance Division (AFS-300)), directorate, or the certificate-holding district office (CHDO), the RCCB may remand the issue to that single office for a response.
- 2.2.2** The RCCB will track issues remanded to a single program office, directorate, or CHDO to ensure they are addressed.
- Note:** If the FAA is already actively working an issue submitted to the RCCB, it may not be accepted by the RCCB.
- 2.3 Other FAA Processes.** The RCCB is not a replacement for other processes currently available to internal and external stakeholders. The RCCB will not accept submissions that should be directed to other FAA programs, processes, or initiatives for action. On a time permitting basis, the RCCB may recommend an appropriate path for resolution for these issues. Examples include recommendations to pursue a petition for exemption, petition for rulemaking, request for legal interpretation, FAA hotline report, or submissions to the Consistency and Standardization Initiative, Whistleblower Program, or the FSIMS Librarian. The RCCB will not track the outcome of issues referred to these programs.
- 2.4 Participants.** The RCCB consists of a chair and points of contact (POC) from each AFS and AIR headquarters (HQ) division and each AIR directorate at the deputy assistant manager level or above, an AIR or AFS liaison who has the authority to assign work within their service, the assistant manager or above of each Aircraft Evaluation Group (AEG), and the AGC Regulations Division (AGC-200).
- 2.4.1 Chair.** The RCCB chair is the facilitator for the RCCB and is appointed by agreement between the Director of Flight Standards Service (AFS-1) and the Director of Aircraft Certification Service (AIR-1). The chair will monitor the RCCB inbox, determine if the

RCCB will accept an issue, and route accepted items to the appropriate POCs in AFS, AIR, and AGC. The chair will facilitate RCCB meetings and coordinate the documentation of the outcome of RCCB issues. The chair will provide direction on policy decisions and task RCCB POCs within AFS and AIR with work, including changes to guidance documents.

**2.4.1.1** The chair will help ensure RCCB issues do not stall during the resolution process. The RCCB will provide an estimated resolution time to the submitter within 45 working days from the date of their submission as described in section 3.3 of this order. The chair will help ensure the estimated resolution date is met. If required, the RCCB chair will elevate issues to AFS-1, AIR-1, and AGC-200 to ensure these issues are given the proper resources to meet the agreed upon deadline.

**2.4.1.2** The chair also establishes and schedules meetings, including telephone bridges or online meetings for the convenience of participants. The chair is responsible for briefing AFS-1, AIR-1, and AGC-200 or their representatives on the status and outcome of RCCB issues.

**2.4.2** Points of Contact (POC). In addition to the chair, the RCCB consists of POCs from each AFS and AIR HQ division and each AIR directorate at the deputy assistant manager level or above, an AIR or AFS liaison who has the authority to assign work within their service, the assistant manager or above of each AEG, and AGC-200.

**Note:** There is only one liaison on the RCCB. The liaison and chair will not be from the same service. For example, if the chair is from AFS, the liaison will be from AIR, and vice versa.

**2.4.2.1** POCs at this level within the organization are necessary to ensure the RCCB is comprised of individuals with decision-making authority for their respective areas. POCs will be responsible for identifying and tasking any additional subject matter expertise within their divisions needed to fully address the regulatory and policy questions raised.

**2.4.2.2** POCs will be responsible for producing the content that the RCCB will use to document resolution of issues. POCs will also be responsible to assist in the coordination of RCCB documents within their respective division, service, or office.

**2.4.3** Subject Matter Experts (SME). POCs within AFS, AIR, and AGC are responsible for identifying and providing SME support as necessary to facilitate a resolution to issues accepted by the RCCB.

**2.5** **Accountability.** Stakeholders expect resolution of issues brought to the RCCB. Due to the complex nature of issues accepted by the RCCB, resolution will require dedicated resources. The RCCB chair and AFS, AIR, and AGC POCs working on RCCB issues are accountable to provide clear and consistent answers in an appropriate amount of time,

given the complexity of each issue. This timeframe will be based on several factors, including complexity and safety risk.

- 2.6 Service Responsibilities.** The success of the RCCB will depend on the full participation of the RCCB chair and POCs. To facilitate this success, AFS, AIR, and AGC are responsible for the following:

- 2.6.1 Appointing POCs.** Each HQ policy division and AEG will appoint a POC. POCs from each HQ division will be at the deputy assistant division manager level or above. POCs from the AEG will be at the assistant manager or above. Additionally, AFS-1 will appoint an AFS liaison who has the authority to assign work within the service (if applicable).

- 2.6.1.1** Each AIR directorate and policy office will appoint a POC at the assistant division manager level or above. Additionally, AIR-1 will appoint an AIR liaison who has the authority to assign work within the service (if applicable).

**Note:** There is only one liaison on the RCCB. The liaison and chair will not be from the same service. For example, if the chair is from AFS, the liaison will be from AIR, and vice versa.

- 2.6.1.2** AGC will appoint AGC-200, or a delegate, as the POC.

- 2.6.2 Attendance at Meetings.** The services will ensure attendance as required at each RCCB meeting. POCs may attend the meetings in person, by conference call, or other means approved by the RCCB chair.

- 2.6.3 SME Support.** SMEs are necessary to provide information or answer questions related to the issue being addressed. POCs will be required to identify and provide necessary SME support.

- 2.7 Meetings.** Because there is no way to predict the timing or topic of incoming RCCB issues, meetings will be held ad hoc. The RCCB chair will work with the POCs to determine which service, division, etc., needs to participate in each meeting based on the topics/issues being discussed.

- 2.7.1 Required Attendance.** If a POC is called to an RCCB meeting, attendance is required. If a POC cannot attend a meeting, it is the responsibility of the POC to notify the chair. The chair will decide if it is appropriate to appoint a representative or to reschedule the meeting.

- 2.7.1.1** Required attendees include:

- The RCCB chair, or designee.
- The RCCB POCs or their designees for AFS HQ divisions and AEGs, as required by the RCCB issue. If the issue requires AFS regional involvement beyond the AEG, a contact from the region will also be identified and required to attend.

- The AIR POCs or their designees for the HQ division and each directorate.
- The AIR or AFS liaison, as appropriate.
- The AGC-200 POC, or delegate, along with any additional managers identified to support the discussion and final decision of the RCCB.

## CHAPTER 3. ISSUE SUBMISSION

**3.1 Submitting Issues.** Any internal or external stakeholder can submit issues to the RCCB. Issues submitted to the RCCB should:

1. Involve regulations or policies within AIR or AFS; and
2. Focus on inconsistencies which require input from more than one policy office, service, or line of business within the FAA, or international aviation authority.

**3.1.1** The RCCB will review issues to ensure they are within the scope of the RCCB before they are accepted.

**3.2 Submission Form.** To facilitate review of issues submitted and help ensure the RCCB has all the necessary information surrounding the inconsistency, the FAA created an electronic submission form. The form is available at [www.BBBBBB.gov](http://www.BBBBBB.gov). Initial submissions must be made through this form.

**3.2.1** The form allows users to submit issues anonymously. Anonymous submission has limitations, including restricting the RCCB's ability to ask follow-on and clarifying questions. Additionally, it will not be possible to notify anonymous submitters if the RCCB accepted the issue or to provide other processes for resolution if the issue is not accepted.

**3.2.2** The initial means of contacting the RCCB is through the submission form. Follow-up conversations may be via email or telephone.

**3.3 Process Timeframes.** In order to meet the needs of stakeholders, the RCCB is committed to responding to RCCB issues in a timely, consistent, and appropriate manner. The RCCB will:

**3.3.1** Within 5 Working Days of Submission. Provide an acknowledgement of receipt via the Web site or an email to the submitter.

**3.3.2** Within 15 Working Days of Receipt of a Submission. Respond via email to the submitter with a determination on whether the RCCB accepted the issue for review. If the RCCB did not accept the issue, the RCCB will direct the submitter to a more appropriate process for resolution, on a time permitting basis.

**3.3.2.1** In cases where the RCCB has to request additional information before making a decision on whether to accept an issue, the 15-working day timeframe begins once the RCCB has received all the additional information.

**3.3.3** Within 45 Working Days of Receipt of a Submission. Provide an update on the status of the issue to the submitter. Due to the anticipated complexity of RCCB issues, a resolution within this 45-day timeframe may not be possible. The RCCB will communicate an estimated time for resolution in this email. The estimated time to address the issue will be



based on the apparent risk the issue poses and concurrence from the RCCB chair and POCs.

**3.3.3.1** For the purposes of providing an estimated date of resolution, resolution is the publication of a memo from the RCCB outlining the actions the FAA took to address the inconsistency. Therefore, the estimated time for providing a resolution will include:

1. The time to review the issue, identifying any inconsistencies;
2. Identification of policy documents that may need amendment;
3. Publication of those documents (if applicable); and
4. The time to draft and coordinate a memo.

**3.3.3.2** The RCCB may provide updates to the submitter during this process. These updates may include actions the FAA has taken to address their issue ahead of the publication of the memo from the RCCB.

**3.3.4** Every 60 Working Days. Provide an update to AFS-1, AIR-1, and AGC-200 on the status of all open RCCB items, along with any items submitted that the RCCB did not accept.

**3.4** **Availability of Information.** Transparency adds clarity and accountability to a system. As stated in a Presidential Memorandum for the Heads of Executive Departments and Agencies, published January 21, 2009, on the subject of Transparency and Open Government, “[t]ransparency promotes accountability and provides information for citizens about what their Government is doing.”

**3.4.1** Documentation of RCCB Resolutions. The RCCB is committed to transparency regarding resolution of issues. Information regarding the final resolution of issues by the RCCB will be made available online to all stakeholders. Memos documenting the final resolution of RCCB issues are on FSIMS under “Publications” and “Other Documents” (<http://fsims.avs.faa.gov/fsims/fsims.nsf/pubdisplay?openform&type=Other&status=active&count=-1>). These memos will be signed by AFS-1, AIR-1, and AGC-200, as appropriate.

**3.4.1.1** RCCB memos are not policy documents. These memos will serve only to document the actions taken by the RCCB to address an issue. For example, if Order 8900.1 changed due to an RCCB issue, the RCCB memo will discuss that change. However, stakeholders must still refer to current guidance for decision-making support (and not the RCCB memo).

**3.5** **Working Collaboratively.** RCCB participants will review issues in a collaborative environment. Adjudicating issues brought to the RCCB may result in changes to existing guidance, creation of new guidance, or amendments to the Code of Federal Regulations. In these events, the RCCB expects the Office of Primary Responsibility (OPR) for the policy to take the lead on these guidance changes and/or rulemaking activities. The OPR is responsible for adopting any agreed upon actions regarding the resolution of issues by the RCCB.



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

**FAA Form 1320-19, Directive Feedback Information**

Please submit any written comments or recommendations for improving this directive, or suggest new items or subjects to be added to it. Also, if you find an error, please tell us about it.

Subject: Order FS 8000.RCCB, Regulatory Consistency Communication Board (RCCB)

To: Directive Management Officer, Richard Mathews

*(Please check all appropriate line items)*

☐ An error (procedural or typographical) has been noted in paragraph \_\_\_\_\_ on page \_\_\_\_.

☐ Recommend paragraph \_\_\_\_\_ on page \_\_\_\_\_ be changed as follows: (attach separate sheet if necessary).

☐ In a future change to this directive, please include coverage on the following subject (briefly describe what you want added):

☐ Other comments:

☐ I would like to discuss the above. Please contact me.

Submitted by: \_\_\_\_\_ Date: \_\_\_\_\_

FTS Telephone Number: \_\_\_\_\_ Routing Symbol: \_\_\_\_\_